

# **Exhibit 4**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**Lochner Technologies, LLC,**

**Plaintiff,**

**v.**

**Boundless Technologies, Inc.;  
CLI, Inc.;  
Devon IT Inc.;  
DT Research, Inc.;  
IGEL Technology America, LLC;  
I-O Corporation;  
NCS Technologies, Inc.;  
Ringdale, Inc.;  
Symbio Technologies LLC;  
TeleVideo, Inc.;  
Z-Axis, Inc.; and  
10ZiG Technology Inc.,**

**Defendants.**

**Civil Action No. 2:11-cv-242-TJW**

**JURY TRIAL DEMANDED**

**AMENDED COMPLAINT**

Plaintiff Lochner Technologies, LLC (“Lochner”) makes the following allegations against defendants:

**PARTIES**

1. Lochner is a California limited liability company with its principal place of business at 719 West Front Street, Suite 173, Tyler, Texas 75702.
2. Defendant Boundless Technologies, Inc. (“Boundless”) is a Delaware corporation with a principal place of business at 1916 State Route 96, Phelps, New York 14532-9705.

19. Each defendant has been and now is jointly and indirectly infringing by way of inducing infringement by others and/or contributing to the infringement by others of the '598 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by, among other things, making, using, importing, offering for sale, and/or selling, without license or authority, products for use in systems that fall within the scope of one or more claims of the '598 patent. Such products include, without limitation, wireless thin clients or wireless zero clients. Such products are for use in systems that infringe at least claims 1 and 12, and likely other claims, of the '598 patent. By making, using, importing, offering for sale, and/or selling such products, each defendant has injured Lochner and is thus liable to Lochner for infringement of the '598 patent under 35 U.S.C. § 271. Those whom each defendant induces to infringe and/or whose infringement to which each defendant contributes are the end users of the above-referenced products. Each defendant had knowledge of the '598 patent at least as early as the filing of the original complaint and is thus liable for infringement of one or more claims of the '598 patent by actively inducing infringement and/or is liable as a contributory infringer of one or more claims of the '598 patent under 35 U.S.C. § 271.

20. As a result of each defendant's infringement of the '598 patent, Lochner has suffered monetary damages to its goodwill, as well as lost profits, and the '598 patent has suffered monetary damages to its value, in an amount not yet determined, and will continue to suffer damages in the future unless each defendant's infringing activities are enjoined by this Court.

21. Unless a permanent injunction is issued enjoining each defendant and its agents, servants, employees, attorneys, representatives, affiliates, and all others acting on its behalf from

**DEMAND FOR JURY TRIAL**

Lochner demands a trial by jury on all issues so triable.

Respectfully submitted,

Dated: July 18, 2011

/s/ Bruce D. Kuyper

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